



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 600
DENVER, COLORADO 80202-2486

file -
T1

Ref 8EPR-F

FEB 27 1998

Mr Steven Slaten
Department of Energy
Rocky Flats Office
P O Box 928
Golden, CO 80402-0928

**RE: Final Proposed Action Memorandum for the Source Removal at Trench 1,
Revision 5**

Dear Mr Slaten

EPA has reviewed the changes made to the above referenced PAM for Trench 1 and has the following comments

Page 19, last paragraph

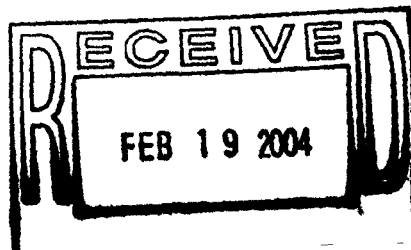
The fourth sentence in this paragraph states, " Per RFCA, radionuclide putback levels will be determined by the sum of ratios" This sentence should be modified to state "Per RFCA, when multiple radionuclides are present, action levels will be determined by the sum-of-ratios method" This change is meant to clarify that the sum-of-ratios method applies to all radionuclide action levels when multiple radionuclides are present, not just to putback levels In addition, EPA has not agreed that the Tier I action levels for radionuclides will also act as putback levels for excavated soils, as stated in our correspondence to Steve Slaten, dated February 3, 1998 and February 25, 1998

The word "putback" should also be deleted from the last sentence on page 19, due to the fact that additional radionuclides might be identified during the project

Page 28, first paragraph in Section 5 1 2

Again, the word "putback" should be deleted from the first sentence in this section since uranium is being discussed

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If you have any questions regarding this matter, please contact Gary Kleeman at 312-6246

Sincerely,



for Tim Rehder
Rocky Flats Team Leader

cc Carl Spreng, CDPHE
Tom Greengard, KH/SAIC
Wayne Sproles, RMRS
Norma Castenada, DOE
Dave Shelton, KH

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